

Exhibit "J"

Molly Moyer

From: Michael R. Baumrind <Baumrind@bmelaw.com>
Sent: Friday, August 6, 2021 9:31 AM
To: Molly Moyer; Sachin Varghese; Tiana S. Mykkeltvedt
Cc: Amanda Kay Seals; mike.weinstein@mbwlaw.net; 'jtonge@atclawfirm.com'; 'Pat McDonough (pmcdonough@atclawfirm.com)'; Richard E. Zelonka; Shayla A. Lytle
Subject: [EXTERNAL] RE: W.K., et al. v. Varahi Hotel, LLC, et al., Case No. 1:20-CV-05263-MHC - Agreement of No Coverage (Atain)

Follow Up Flag: Follow up
Flag Status: Completed

Thanks, Molly. We agree that the Atain Specialty Insurance Company Policy No. CIP250491 issued to Global Management for the period April 1, 2015 to December 6, 2015 does not cover the claims in this case. Please let us know how you'd like to memorialize that.

Michael R. Baumrind

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From: Molly Moyer <MMoyer@wshblaw.com>
Sent: Tuesday, July 27, 2021 3:15 PM
To: Sachin Varghese <varghese@bmelaw.com>; Tiana S. Mykkeltvedt <mykkeltvedt@bmelaw.com>
Cc: Amanda Kay Seals <Seals@bmelaw.com>; mike.weinstein@mbwlaw.net; 'jtonge@atclawfirm.com' <jtonge@atclawfirm.com>; 'Pat McDonough (pmcdonough@atclawfirm.com)' <pmcdonough@atclawfirm.com>; Michael R. Baumrind <Baumrind@bmelaw.com>; Richard E. Zelonka <RZelonka@wshblaw.com>; Shayla A. Lytle <SLytle@wshblaw.com>
Subject: W.K., et al. v. Varahi Hotel, LLC, et al., Case No. 1:20-CV-05263-MHC - Agreement of No Coverage (Atain)

CAUTION: External Email.

All,

We are reaching out about the above referenced matter pending against Varahi Hotel, LLC in the Northern District. As you know, we represent Atain Specialty Insurance Company who issued a commercial general liability policy to Global Management and Investment for the policy period April 1, 2015 to December 6, 2015.

For the reasons previously discussed in the Jane Doe 1 matter, we do not believe that Atain's policy provides coverage for this lawsuit. Specifically, the policy does not expressly insure Varahi and also contains assault and battery and sexual abuse exclusions. As such, we are writing to see if plaintiffs will consent to an agreement of no coverage for Varahi under Atain's policy before proceeding with another declaratory judgment action. Please let us know.

Thank you,

Molly Moyer

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